

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 Wave 12: MDL 2327</b>
<b>THIS DOCUMENT RELATES TO:</b>  <i>Cases Listed in Plaintiffs' Exhibit A</i>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**NOTICE OF ADOPTION OF PRIOR RESPONSES IN OPPOSITION TO *DAUBERT*  
MOTION TO EXCLUDE EXPERT TESTIMONY OF TED ROTH, M.D.**

In response to Plaintiffs' notice adopting their prior *Daubert* motions as to Ted Roth, M.D. (Doc. 8740 (adopting Docs. 3658, 3668, 3857)), Defendants hereby adopt and incorporate by reference their prior responsive briefing (Doc. 3755) in opposition to the motion to exclude his testimony. Defendants respectfully request that the Plaintiffs' motion be denied for the reasons stated in the prior briefing.

This notice applies to the Wave 12 cases identified in Plaintiffs' Exhibit A.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage  
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